

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:24-cv-24089-CMA

ELIZABETH SANTIAGO-DURAN,

Plaintiff,

v.

**VANGUARD PARKING SOLUTIONS INC,
PENN CREDIT CORPORATION, and
PARADISE PARKING SYSTEM LLC,**

Defendants.

**NOTICE REGARDING EXPRESSED INTENT OF
DEFENDANT PARADISE PARKING SYSTEMS LLC**

Plaintiff Elizabeth Santiago-Duran (“Plaintiff”) submits this Notice with respect to Defendant Paradise Parking Systems LLC (“Paradise”) and states:

1. On January 18, 2025, the Second Amended Complaint was filed. Doc. 55.
2. On January 21, 2025, Paradise was served with the Second Amended Complaint. Doc. 61.
3. The deadline for Paradise to respond to the Second Amended Complaint is February 11, 2025. Id.
4. On February 11, 2025, general counsel for Paradise, Jacob H. Nunez, Esq. (“Mr. Nunez”), contacted Plaintiff, through undersigned counsel, regarding the above-captioned matter.
5. Mr. Nunez advised that Paradise plans to defend the above-captioned action, but that Paradise is in the process of retaining separate counsel, or additional co-counsel, because he is not barred in the Southern District of Florida. To these ends, Mr. Nunez requested a twenty (20) day extension of time for Paradise to respond to the Second Amended Complaint.

6. Plaintiff, by and through undersigned counsel, advised Mr. Nunez that **Plaintiff does not oppose** the requested twenty (20) day extension.

7. Plaintiff, by and through undersigned counsel, is unable to represent the interests of Paradise before this Court; however, Plaintiff, in good faith and full candor to this tribunal, notifies the Court as to the foregoing events and circumstances.

DATED: February 11, 2025

Respectfully Submitted,

/s/ Thomas Patti

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COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 11, 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Thomas J. Patti

THOMAS J. PATTI, ESQ.

Florida Bar No.: 118377